

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE )  
TATE, JEREMY S. MELTON, ISSACCA POWELL, )  
KEITH BURGESS, TRAVIS BOYD, TERRENCE )  
DRAIN, and KIMBERLY ALLEN on behalf of )  
Themselves and all similarly situated persons )

PLAINTIFFS, )

v. )

BILL OLDHAM, in his individual capacity as former )  
Sheriff of Shelby County, Tennessee; FLOYD )  
BONNER, JR., in his official capacity as Sheriff of )  
Shelby County, Tennessee; ROBERT MOORE, in his )  
individual capacity as former Jail Director of Shelby )  
County, Tennessee; KIRK FIELDS, in his official )  
capacity as Jail Director of Shelby County, Tennessee; )  
CHARLENE McGHEE, in her individual capacity as )  
former Assistant Chief of Jail Security of Shelby County, )  
Tennessee; REGINALD HUBBARD, in his official )  
capacity as Assistant Chief of Jail Security of Shelby )  
County, Tennessee; DEBRA HAMMONS, in her )  
individual capacity as former Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; TIFFANY )  
WARD in her official capacity as Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; SHELBY )  
COUNTY, TENNESSEE, a Tennessee municipality; )  
TYLER TECHNOLOGIES, INC., a foreign corporation; )  
GLOBAL TEL\*LINK CORPORATION, a foreign )  
corporation; SOFTWARE AG USA, INC., a foreign )  
corporation; and SIERRA-CEDAR, INC., a foreign )  
corporation, SIERRA SYSTEMS GROUP, INC., a )  
foreign corporation; and TETRUS CORP, a foreign )  
corporation )

DEFENDANTS. )

**Case No.: 2:16-cv-2907-  
SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY,  
& INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

**MOTION TO DISMISS COMPLAINT AGAINST TETRUS CORP.**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Tetrus Corp. (“Tetrus”) moves for dismissal of the Seventh Amended Complaint as it fails to state a claim against Tetrus upon which relief can be granted as a matter of law. Specifically, the Seventh Amended Complaint, as against Tetrus, is time-barred by the expiration of the statute of limitations. A separate memorandum supporting the motion is filed herewith.

It is respectfully requested that the Court grant the motion and dismiss Tetrus from this case.

Respectfully submitted,

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#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served on the following counsel of record via the Court’s CM/ECF system, this 31st day of August, 2020:

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